

RICHARD A. HARRIS, ESQ.
Nevada State Bar No. 505
JOSHUA R. HARRIS, ESQ.
Nevada State Bar No. 9580
RICHARD HARRIS LAW FIRM
801 S FOURTH ST.
LAS VEGAS NV 89101
Ph: (702) 444-4392
Fax: (702) 444-4455
Email: rick@richardharrislaw.com

7 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

13 RONALD SCOTT BEATTY

15 Plaintiff,

Case No. 2:13-cv-1092-APG-GWF

16

**STIPULATED MOTION FOR
EXTENSION OF TIME TO
FILE REPLY TO DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
FOR REMAND/REVERSAL (FIRST
REQUEST)**

22 CARMEN W. COLVIN,
ACTING COMMISSIONER OF SOCIAL SECURITY,

23 | Defendant.

26 Comes now Plaintiff, by and through his attorney, JOSHUA R. HARRIS, ESQ.,
27 requesting a THIRTY (30) day extension of time, to file Plaintiff's Reply to Defendant's Response.

1 Plaintiff's current deadline for this brief is May 23, 2014. Opposing Counsel has no objection to this
2 request for an extension, and has stipulated to this filing by email.
3

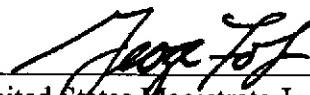
4 The extension is necessary because the Harris firm's appellate contract associate, attorney
5 Linda Ziskin, very recently experienced the death of her mother. She would appreciate having some
6 time for bereavement, and to catch up with delayed work while she was out of town. It is therefore
7 respectfully requested that Plaintiff be granted a 30 day extension of time to file the **Reply to**
8 **Defendant's Response to Plaintiff's Motion for Remand and/or Reversal**, up to and including
9 June 23, 2014.

10
11
12 DATED this 14th day of May, 2014.

13
14 /s/ Joshua R. Harris
15 **Joshua R. Harris**
16 Nevada State Bar No. 9580
17 Ph: (702) 444-4392
18 Of Attorneys for Plaintiff

19
20 /s/ Heather M. Moss (signed by email authorization)
Heather M. Moss
21 Assistant Regional Counsel
22 Office of the General Counsel, Region IX
Social Security Administration
23 160 Spear Street, Suite 800
San Francisco, CA 94105
(415) 977-8826
heather.moss@ssa.gov

24 **IT IS SO ORDERED.**

25
26 
United States Magistrate Judge
27 DATED: 5/19/2014

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